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11	ATTORNEYS FOR DEFENDANT THE LINCOLN NATIONAL LIFE INSURANCE COMPANY		
12			
13	UNITED STATES DISTRICT COURT FOR		
14	DISTRICT OF NEVADA		
15	VALERIE MOTA,	Case No. 2:17-CV-1405-APG-CWH	
16	Plaintiff,	STIPULATION AND ORDER TO	
17	V.	EXTEND DEADLINE TO RESPOND TO COMPLAINT	
18	THE LINCOLN NATIONAL LIFE	(First Request)	
19	INSURANCE COMPANY,	Current Response Date: 06-13-2017	
20	Defendant.	New Response Date: 07-11-2017	
21			
22			
23	Pursuant to Local Rule IA 6-1, Plaintiff Valerie Mota and defendant The Lincoln National		
24	Life Insurance Company ("Lincoln") (together, the "Parties") hereby stipulate as follows:		
25	WHEREAS, Plaintiff filed an initial Complaint in this case on May 18, 2017;		
26	WHEREAS, Plaintiff personally served Lincoln with the Complaint on May 23, 2017.		
27	WHEREAS, Lincoln has requested and Plaintiff has agreed to extend Lincoln's deadline		
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	Case No. 2:17-cv-1405-APG-CWH	STIPULATION AND ORDER TO EXTEND DEADLINE TO RESPOND TO COMPLAINT	

1	to respond to the Complaint from June 13, 2017 to July 11, 2017;		
2	WHEREAS, this is the first stipulation for an extension of time to respond to the		
3	Complaint;		
4	IT IS HEREBY STIPULATED AND AGREED, and the Parties request that Lincoln may		
5	file its responsive pleading in this matter no later than July 11, 2017.		
6	IT IS SO STIPULATED.		
7 8	Dated: June 12, 2017	MCCORMICK, BARSTOW, SHEPPARD, WAYTE & CARRUTH	
9			
10		By: /s/ Wade Hansard Wade Hansard, Esq.	
11		Nevada Bar No.: 008104 8337 W. Sunset Rd., Ste. 350	
12		Las Vegas, NV 89113 (702) 949-1100	
13		Attorneys for Defendant THE LINCOLN NATIONAL LIFE INSURANCE	
14		COMPANY	
15	Dated: June 12, 2017	ERISA LAW CENTER	
16			
17		By: /s/ Robert Rosati	
18		Robert J. Rosati (pro hac vice)	
19		6485 N. Palm Ave., Ste. 105 Fresno, CA 93704	
20		(559) 478-4119 Attorneys for Plaintiff VALERIE MOTA	
21	Dated: June 12, 2017	HATFIELD LAW ASSOCIATES	
22	Dated. Julie 12, 2017	HATTILLD LAW ASSOCIATES	
23		By: /s/ Trevor Hatfield	
24		Trevor Hatfield, Esq. Nevada Bar No.: 7373	
25		703 S. Eighth Street Las Vegas, NV 89101	
26		(702) 388-4469 Attorneys for Plaintiff VALERIE MOTA	
27		Thomas of the minute of the second of the se	
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	Case No. 2:17-cv-1405-APG-CWH	2 STIPULATION AND ORDER TO EXTEND	

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

DATED: _____ 13, 2017